

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
PLAINTIFF,	)	
	)	
v.	)	Case No. 15 CR 526
	)	
THADDEUS JIMENEZ,	)	
	)	
DEFENDANT.	)	

**MOTION TO VACATE  
WARRANT ISSUED ON JANUARY 8, 2024**

NOW COMES the Defendant, THADDEUS JIMENEZ, by the undersigned counsel, requesting that this Court vacate the warrant issued on January 8, 2024. In support, Defendant states the following:

1. On June 22, 2016, Defendant Jimenez pled guilty to Count I of the indictment. On March 23, 2017, he was sentenced to 110 months in the Federal Bureau of Prisons, to be followed by a term of three (3) years of supervised release.
2. At the time of his indictment, plea, and sentencing, Defendant had state court charges that had arisen out of the same incident. On June 16, 2020, the Court recommended that the sentence imposed in federal court be served concurrently with any sentence imposed in state court.
3. At the time, in 2020, Defendant was at the Cook County Jail, awaiting disposition of his state case.
4. On July 19, 2023, Defendant pled guilty in state court and was sentenced to a concurrent term of twelve (12) years (144 months).

5. After his plea, the Cook County Sheriff shipped the Defendant to the Illinois Department of Corrections (IDOC) to complete whatever time was remaining on his sentence. IDOC currently has custody of Defendant Jimenez.

6. IDOC has a program whereby they will exile certain inmates to a different state to serve their Illinois sentence. For example, Drew Peterson is now housed in the Indiana Department of Corrections, serving an Illinois sentence. They have done the same with Mr. Jimenez. He is now housed in North Carolina. Defense counsel will provide his contact information to his supervising officer if his supervising officer requests it.

7. This information was not previously provided because the special report that was filed was not served on defense counsel. Defendant is asking that his counsel be served with a copy of the special report, and that the warrant that was issued be vacated, since Mr. Jimenez remains in custody.

8. It is essential that the warrant be vacated as its existence has real effect upon the placement security rating and could affect the good time calculation.

9. It is expected that Mr. Jimenez will remain in custody for at least another year. Once his contact information is provided to his supervising officer they hopefully will be able to communicate and determine how best to proceed.

WHEREFORE, Defendant THADDEUS JIMENEZ respectfully requests that the warrant issued against him be vacated, and for any and all such further and other relief as this Court deems just and appropriate under the circumstances.

Respectfully Submitted,

THADDEUS JIMENEZ, Defendant

By: /s/ Steven A. Greenberg  
One of Defendant's Attorneys

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